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     Attorneys for the United States of America
11
                              UNITED STATES DISTRICT COURT
                            NORTHERN DISTRICT OF CALIFORNIA
12
                                     OAKLAND DIVISION
13
     UNITED STATES OF AMERICA,
                                                   No. CR 07-00006 SBA
14
           Plaintiff,
15
                                                   STIPULATION AND ORDER TO
16
                                                   VACATE TRIAL DATE AND TO SET
        v.
                                                   FOR CHANGE OF PLEA ON
17
    JOANNE FOUNTAINE and
                                                   SEPTEMBER 23, 2008 AT 11:00 A.M.
     ANTHONY TIMMONS,
18
           Defendants.
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20
                                        STIPULATION
21
           The parties, by and through undersigned counsel, hereby agree and stipulate as follows:
           Trial in the present case is set for October 6, 2008. On September 8, 2008 the parties
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     stipulated that the deadline for submission of pretrial preparation required by the Court be set for
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    September 12, 2008. The parties further stipulated that the deadline for motions in limine and
     objections to evidence be September 16, 2008, and that the deadline for responses to motions in
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    limine and objections to evidence be September 23, 2008. The Court issued an order on
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    September 9, 2008 granting that stipulation.
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28
     STIPULATION AND [PROPOSED] ORDER
    No. CR 07-00006 SBA
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Case 4:07-cr-00006-SBA Document 194 Filed 09/15/08 Page 2 of 3

1	The parties have been engaged in discussions regarding a potential resolution of the case	
2	by plea agreements, and have reached agreements in principle. For the foregoing reasons, the	
3	parties stipulate and request that the October 6, 2008 trial date, the September 30, 2008 pretrial	
4	conference date, and related pre-trial submission deadlines be vacated, and the case be scheduled	
5	for changes of plea hearing for both defendants on September 23, 2008, at 11:00 a.m.	
6		
7		LATHAM & WATKINS LLP
8		
9	Dated: September 12, 2008	By ROBERT E. SIMS
10		HOLLY J. TATE Attorneys for Defendant
11		Joanne Fountaine
12		
13		
14	Dated: September 12, 2008	By LINDA FULLERTON
15		Attorney for Defendant Anthony Timmons
16		·
17		
18		JOSEPH P. RUSSONIELLO United States Attorney
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20	,	By /s/ ANDREW S. HUANG
21		CHINHAYI J. COLEMAN Assistant United States Attorneys
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_•	STIPULATION AND [PROPOSED] ORDER No. CR 07-00006 SBA 2	

ORDER Based on the reasons provided in the stipulation of the parties above, the Court hereby ORDERS that the October 6, 2008 trial date is vacated, and that the case is scheduled for a changes of plea hearing for defendants Joanne Fountaine and Anthony Timmons on September 23, 2008, at 11:00 a.m. Dated: September 15, 2008 Hon. SAUNDRA BROWN ARMSTRONG **United States District Court** Northern District of California STIPULATION AND [PROPOSED] ORDER